REMARKS

Claims 1-20 are currently pending in the application. Claims 1, 3-8, and 10-14 have been amended herein. No claims have been added or canceled. Accordingly, claims 1-20 will be pending following the entry of this paper. Reconsideration of the present application is respectfully requested in view of the foregoing amendments and following remarks.

Examiner Interview

At the outset, Applicants wish to thank the Examiner for the courtesies extended in the recent telephonic Examiner Interview. While no agreement was reached during the interview, based on the conversation it is believed that the foregoing amendments recite features that the Examiner would recognize as distinguishing over the references of record, particularly with respect to network communications exchanged related to the claimed configuration information.

The Obviousness Rejections

Claims 1 and 3-14 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,519,509 to Nierlich et al. (hereinafter referred to as "Nierlich") in view of U.S. Patent No. 6,266,713 to Karanam et al. (hereinafter referred to as "Karanam").

Claim 1

Independent claim 1 has been amended to more clearly point out the claimed invention, and is directed to a reconfigurable network-equipment power-management system. Claim 1 comprises:

> a power-distribution apparatus having a power input disposed in the power-distribution apparatus and a communication interface disposed in the power-distribution apparatus for communicating with a remote user system;
>
> a plurality of power-control outlets disposed in the power-distribution apparatus, the plurality of power-

control outlets connectable in power supply communication with the power input and one or more separate electronic appliances;

a plurality of power-control relays disposed in the power-distribution apparatus, each of the plurality of power-control relays in power control communication with at least one among the plurality of power-control outlets, whereby the plurality of power-control outlets and the plurality of power-control relays provide operating power to the one or more separate electronic appliances and are able to interrupt the operating power to the one or more separate electronic appliances;

a power-control outlet user configuration accessible by the remote user system for affecting the power provided or interrupted to the plurality of power-control outlets, wherein the power-control outlet user configuration comprises user configuration data for at least one of the plurality of power-control outlets disposed in the power-distribution apparatus;

a memory disposed in the power-distribution apparatus and having a power-control outlet user configuration storage area; and

at least one power controller disposed in the power-distribution apparatus, wherein the at least one power controller corresponds to at least two of the plurality of power-control outlets, the at least one power controller comprising a power-control outlet user configuration transfer mechanism in communication with the communication interface accessible by the remote user system, whereby the power-control outlet user configuration transfer mechanism imports and exports the power-control outlet user configuration data between-the power-distribution apparatus and the remote user system via the communication interface as a plurality of data packets that are assembled to form the power-control outlet user configuration.

It is respectfully submitted that the cited references do not render claim 1 obvious. Nierlich discloses a system and method for monitoring and controlling energy distribution. Karanam is directed to a dynamic data exchange (DDE) server that allows external programs to access power management data. It is submitted that neither Nierlich nor Karanam provide any teaching of a *power-control outlet*

user configuration accessible by a remote user system via the communication interface through a *plurality of data packets that are assembled to form the power-control outlet user configuration*, for affecting power provided or interrupted to the plurality of power-control outlets, as claimed.

The Office Action asserts that Nierlich allegedly discloses a configuration file that affects the power to the plurality of power-control outlets. However, Nierlich contains no disclosure of the claimed power-control outlets, and thus cannot disclose a configuration that affects operating power to power-control outlets, much less a power controller as claimed where the power-control outlet user configuration transfer mechanism imports and exports the power-control outlet user configuration data between the power-distribution apparatus and the remote user system via the communication interface as a plurality of data packets that are assembled to form the power-control outlet user configuration. Nierlich describes, for example, at col. 7, lines 16-21, that analog and relay controlled voltage channels are preferably connected to the end-user's *control systems* (emphasis added). This is further supported at col. 7, lines 34-47, where Nierlich describes that the voltage channels can generate signals "that can interface end-user's controls 24 and allows relatively low power signals to control high powered devices." Furthermore, the analog voltage channels described in Nierlich can produce a voltage range from 0.95V and 2.6V, that may interface and control end-user control systems. The relay-controlled voltage channels can generate signals of varying pulse widths that vary between 20 and 90 ms intervals. Nierlich is consistent throughout the specification that the network access device may be used to interface with an end-user site to provide information that may be used by an individual or end-user control systems to control the user's loads. Therefore, the voltage channels cannot read on the claimed power-control outlets, because these channels do not provide operating power to one or more separate electronic appliances, and are not able to provide or interrupt such power. Furthermore, Nierlich provides no disclosure related to the import and export of a user configuration as claimed.

The Office Action recognizes that Nierlich does not disclose exporting a power-control user configuration, and relies on Karanam as providing such a disclosure. However, Karanam does not cure the deficiencies of Nierlich. Karanam is directed to a system that includes a dynamic data exchange (DDE) server used in a power management control system. The disclosed DDE server includes logical data tables, and a variety of connected modules, as described at col. 5, lines 1-39, and illustrated in Fig. 3. Karanam describes, for example, at col. 5 lines 32-36, that a load management module may provide for tracking power demand and automatically shedding non-critical loads to prevent peak demand penalties. In such a manner, the system of Karanam is similar to that described in Nierlich, as both systems may provide commands to other systems related to controlling other systems. As illustrated in Fig. 3, the output of the module is provided to a DDE server that is connected to an interface card that communicates with a network. As such, Karanam is devoid of any teaching or suggestion relating to power-control outlets, or a power-control outlet configuration as recited by claim 1.

Therefore, it is submitted that Nierlich and Karanam, alone or in any reasonable combination, do not render claim 1 obvious. Accordingly, claim 1 is allowable because the cited references do not render the claim obvious, and it is respectfully submitted that the 35 U.S.C. 103(a) rejection should be withdrawn from independent claim 1 and such action is respectfully requested.

Each of claims 3-9 is a dependent claims that depends either directly or indirectly from independent claim 1. Consequently, each of these dependent claims is at least allowable for the reasons noted with respect claim 1 from which it depends. However, each of these dependent claims may be allowable for additional reasons, and the right to assert any such reason in the future is reserved.

Claim 10

Independent claim 10 is directed to a method of managing user configuration data in a reconfigurable network-equipment power-management and distribution system. Claim 10 comprises:

> providing power to one or more separate electronic appliances through a plurality of power-control outlets disposed in a local power-distribution apparatus;
>
> remotely controlling the plurality of power-control outlets disposed in the local power-distribution apparatus with a remote control application to supply or interrupt power to one or more of the plurality of power-control outlets;
>
> transferring power-control outlet user configuration data to the local power-distribution apparatus through a network software conversion agent that converts software commands communicated as packets into the power-control outlet user configuration data, the power-control outlet user configuration data comprising user configuration data for supplying or interrupting power for the plurality of power-control outlets disposed in the local power-distribution apparatus;
>
> uploading a copy of the power-control outlet user configuration data to the remote control application from the local power-distribution apparatus over a data communication channel through the network software conversion agent; and
>
> downloading a substitute power-control outlet user configuration data from the remote control application to the local power-distribution apparatus over the data communication channel through the network software conversion agent, wherein the substitute power-control outlet user configuration data may replace the power-control outlet user configuration data.

It is respectfully submitted that the cited references do not render claim 10 obvious. Nierlich, as discussed above, discloses a system and method for monitoring and controlling energy distribution, and is devoid of any teaching of transferring a power-control outlet user configuration through a network software conversion agent, the user configuration comprising user configuration data for

supplying or interrupting power for each of the plurality of power-control outlets, as claimed. The Office Action asserts that Nierlich discloses voltage channels that read on the claimed power-control outlets, and that Nierlich further discloses that the device receives instructions that control the voltage channels. However, it is submitted that this reference does not provide any disclosure of power-control outlets as claimed, nor does Nierlich provide for transferring a user configuration as claimed.

More specifically, Nierlich describes that a network access device may be used to monitor various power meters and provide control signals that may interface with other systems to reduce power consumption during a curtailment event. As discussed above, Nierlich contains no disclosure of the claimed power-control outlets, and thus cannot disclose transferring a configuration as claimed. This is further supported throughout the specification, for example, Nierlich describes, at col. 7, lines 16-21, that analog and relay controlled voltage channels are preferably connected to the end-user's *control systems* (emphasis added). This is further supported at col. 7, lines 34-47, where Nierlich describes that the voltage channels can generate signals "that can interface end-user's controls 24 and allows relatively low power signals to control high powered devices." Furthermore, the analog voltage channels described in Nierlich can produce a voltage range from 0.95V and 2.6V, that may interface and control end-user control systems. The relay-controlled voltage channels can generate signals of varying pulse widths that vary between 20 and 90 ms intervals. Nierlich is consistent throughout the specification that the network access device may be used to interface with an end-user site to provide information that may be used by an individual or end-user control systems to control the user's loads. Therefore, the voltage channels cannot read on the claimed power-control outlets, because these channels do not provide operating power to one or more separate electronic appliances, and are not able to provide or interrupt such power.

Also, similarly as discussed above, Karanam does not cure the deficiencies of Nierlich. Karanam is directed to a system that includes a dynamic data

exchange (DDE) server used in a power management control system. The disclosed DDE server includes logical data tables, and a variety of connected modules, as described at col. 5, lines 1-39, and illustrated in Fig. 3. Karanam describes, for example, at col. 5 lines 32-36, that a load management module may provide for tracking power demand and automatically shedding non-critical loads to prevent peak demand penalties. In such a manner, the system of Karanam is similar to that described in Nierlich, as both systems may provide commands to other systems related to controlling other systems. As illustrated in Fig. 3, the output of the module is provided to a DDE server that is connected to an interface card that communicates with a network. As such, Karanam does not provide any disclosure relating power-control outlets or transferring a power-control outlet configuration as recited by claim 10.

Therefore, it is submitted that Nierlich and Karanam, alone or in any reasonable combination, do not render claim 10 obvious. Accordingly, claim 10 is allowable because the cited references do not render the claim obvious. Accordingly, the applicants respectfully submit that the 35 U.S.C. § 103(a) rejection should be withdrawn from independent claim 10 and such action is respectfully requested.

Each of claims 11 and 12 is a dependent claims that depends either directly or indirectly from independent claim 10. Consequently, each of these dependent claims is at least allowable for the reasons noted with respect claim 10 from which it depends. However, each of these dependent claims may be allowable for additional reasons, and the applicant reserves the right to assert any such reason in the future.

Claim 13

Independent claim 13 is directed to a remote power manager system in communication with a distal power manager application through a data communications network. Claim 13 comprises a combination of elements, including:

A. a remote power manager having power input connectable to a power network that provides power to be distributed to associated electronic devices, a plurality of power-control power output ports connectable to the power input and the associated electronic devices, a power controller in power controlling communication with the plurality of power-control power output ports, a data communications network port system in communication with the power controller and being connectable to the data communications network, and a power manager memory providing storage for a power-control power output port user configuration, the power-control power output port user configuration comprising user configuration data for supplying or interrupting power to the plurality of power-control power output ports and

B. a power-control power output port user configuration transfer application providing for selectably importing a power-control power output port user configuration from the distal power manager application through the data communications port system to the power manager memory, or exporting the power-control power output port user configuration from the power manager memory through the data communications network port system to the distal power manager application over the data communications network through a plurality of packets that are assembled form the power-control power output port user configuration.

It is respectfully submitted that the cited references do not render claim 13 obvious. Nierlich, as discussed above, discloses a system and method for monitoring and controlling energy distribution, and is devoid of any teaching of a remote power manager having a plurality of power-control power output ports connectable to the power input and the associated electronic devices, and a power manager memory providing storage for a power-control power output port user configuration, the power-control power output port user configuration comprising user configuration data for supplying or interrupting power to each of the plurality of power-control power output ports, as claimed. The Examiner asserts that Nierlich discloses voltage channels read on the claimed power-control power output ports, and that Nierlich further discloses that the device receives instructions

that control the voltage channels. However, similarly as described above, this reference does not provide any teaching or suggestion of supplying or interrupting power to power-control power output ports, and therefore cannot disclose a remote power manager as claimed.

More specifically, Nierlich describes that a network access device may be used to monitor various power meters and provide control signals that may interface with other systems to reduce power consumption during a curtailment event. For example, Nierlich describes at col. 7, lines 16-21, that analog and relay controlled voltage channels are preferably connected to the end-user's *control systems*. (emphasis added). This is further supported at col. 7, lines 34-47, where Nierlich describes that the voltage channels can generate signals "that can interface end-user's controls 24 and allows relatively low power signals to control high powered devices." Furthermore, the analog voltage channels described in Nierlich can produce a voltage range from 0.95V and 2.6V, that may interface and control end-user control systems. The relay-controlled voltage channels can generate signals of varying pulse widths that vary between 20 and 90 ms intervals. Nierlich is consistent throughout the specification that the network access device may be used to interface with an end-user site to provide information that may be used by an individual or control systems to control the user's loads. Therefore, the voltage channels cannot read on the claimed remote power manager having a plurality of power-control power output ports.

Also, similarly as discussed above, Karanam does not cure the deficiencies of Nierlich. Karanam is directed to a system that includes a dynamic data exchange (DDE) server used in a power management control system. The disclosed DDE server includes logical data tables, and a variety of connected modules, as described at col. 5, lines 1-39, and illustrated in Fig. 3. Karanam describes, for example, at col. 5 lines 32-36, that a load management module may provide for tracking power demand and automatically shedding non-critical loads to prevent peak demand penalties. In such a manner, the system of Karanam is similar to that described in Nierlich, as both systems may provide commands to

other systems related to controlling other systems. As illustrated in Fig. 3, the output of the module is provided to a DDE server that is connected to an interface card that communicates with a network. Karanam does not provide any teaching or suggestion relating a remote power manager as recited by claim 13.

Therefore, it is submitted that Nierlich and Karanam, alone or in any reasonable combination, do not render claim 13 obvious. Accordingly, claim 13 is allowable because the cited references do not render the claim obvious. Accordingly, the applicants respectfully submit that the 35 U.S.C. 103(a) rejection should be withdrawn from independent claim 13 and such action is respectfully requested.

Claims 15-20 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Nierlich and Karanam, and further in view of U.S. Patent No. 6,608,406 to Bersiek (hereinafter referred to as "Bersiek").

Each of claims 15-18 is a dependent claim that depends either directly or indirectly from independent claim 1. Each of claims 19-20 is a dependent claim that depends either directly or indirectly from independent claim 13. Consequently, each of these dependent claims is at least allowable for the reasons noted with respect to the independent claim from which it depends. However, each of these dependent claims may be allowable for additional reasons, and the applicant reserves the right to assert any such reason in the future.

Claim 2

Claim 2 has been rejected under 35 U.S.C. §103(a) as being unpatentable over the Nierlich and Karanam, and further in view of U.S. Patent No. 6,459,175 to Potega (hereinafter referred to as "Potega").

Claim 2 is a dependent claim that depends from independent claim 1 . Consequently, this dependent claim is at least allowable for the reasons noted with respect to the independent claim from which it depends. This dependent claim may be allowable for additional reasons, and the applicant reserves the right to assert any such reason in the future.

Claims 15-20

Claims 15-20 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Nierlich and Karanam, and further in view of U.S. Patent No. 6,608,406 to Bersiek (hereinafter referred to as "Bersiek").

Each of claims 15-18 is a dependent claim that depends either directly or indirectly from independent claim 1. Each of claims 19-20 is a dependent claim that depends either directly or indirectly from independent claim 13. Consequently, each of these dependent claims is at least allowable for the reasons noted with respect to the independent claim from which it depends. However, each of these dependent claims may be allowable for additional reasons, and the applicant reserves the right to assert any such reason in the future.

<u>The Obviousness rejections based on Potega, Nierlich and Karanam</u>

Claims 1, 13, and 14 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Potega in view of Nierlich, and further in view Karanam.

Claim 1

Independent claim 1 is directed to a reconfigurable network-equipment power-management system. Claim 1 comprises:

> a power-distribution apparatus having a power input disposed in the power-distribution apparatus and a communication interface disposed in the power-distribution apparatus for communicating with a remote user system;
>
> a plurality of power-control outlets disposed in the power-distribution apparatus, the plurality of power-control outlets connectable in power supply communication with the power input and one or more separate electronic appliances;
>
> a plurality of power-control relays disposed in the power-distribution apparatus, each of the plurality of power-control relays in power control communication

with at least one among the plurality of power-control outlets, whereby the plurality of power-control outlets and the plurality of power-control relays provide operating power to the one or more separate electronic appliances and are able to interrupt the operating power to the one or more separate electronic appliances;

a power-control outlet user configuration accessible by the remote user system for affecting the power provided or interrupted to the plurality of power-control outlets, wherein the power-control outlet user configuration comprises user configuration data for at least one of the plurality of power-control outlets disposed in the power-distribution apparatus;

a memory disposed in the power-distribution apparatus and having a power-control outlet user configuration storage area; and

at least one power controller disposed in the power-distribution apparatus, wherein the at least one power controller corresponds to at least two of the plurality of power-control outlets, the at least one power controller comprising a power-control outlet user configuration transfer mechanism in communication with the communication interface accessible by the remote user system, whereby the power-control outlet user configuration transfer mechanism imports and exports the power-control outlet user configuration data between-the power-distribution apparatus and the remote user system via the communication interface as a plurality of data packets that are assembled to form the power-control outlet user configuration.

It is respectfully submitted that the cited references do not render claim 1 obvious. Potega is directed to a power supply that may detect power requirements and configure itself to provide correct power to a particular device. A number of power supplies may be used, with a master control unit that controls the delivery and supply of power that each of the power supplies provides to devices. For example, as described at col. 30, line 63, through col. 31, line 8, a remote Master Control Unit (MCU) sends commands to controllable power supplies. However, Potega is devoid of any disclosure of a power-control outlet configuration accessible by a remote user system for affecting power provided or interrupted to

the plurality of power-control outlets, wherein the power-control outlet user configuration comprises user configuration data for each of the plurality of power-control outlets disposed in the power-distribution apparatus, as claimed. In fact, Potega does not describe anything relating to a power-control outlet user configuration.

Nierlich and Karanam are discussed above. As discussed above, Nierlich does not teach or suggest a power-control outlet user configuration, nor a power-control outlet user configuration accessible by a remote user system for affecting power provided or interrupted to a plurality of power-control outlets, a memory, or at least one power controller board, as claimed. Nierlich describes a system and method for monitoring and controlling energy distribution in which control signals may be transmitted to end-users or end-user control systems in the event of a curtailment event.

Karanam, as discussed above, is directed to a system that includes a dynamic data exchange (DDE) server used in a power management control system. As discussed above, Karanam does not teach or suggest anything related to a power-control outlet user configuration, nor a power-control outlet user configuration accessible by the remote user system for affecting power provided or interrupted to the plurality of power-control outlets, wherein the power-control outlet user configuration comprises user configuration data for each of the plurality of power-control outlets disposed in the power-distribution apparatus. Furthermore, Karanam also has no disclosure related to a memory, or power controller board as claimed in claim 1.

The Office Action states that Potega does not provide a power-control outlet configuration, and asserts that rather than sending commands one at a time as taught by Potega, one of ordinary skill in the art would have been motivated to use Nierlich's configuration to save on the amount of communications on the network. Applicants disagree.

As noted, the Office Action asserts that to the extent Potega transfers information from a MCU to a controllable power supply, transferring the

information in a configuration would be more efficient. However, Potega is directed to applications in which various different powered devices may be connected to a power supply, and the power supply reconfigures its output voltage to the powered device's requirements without user intervention and without any pre-programmed prior knowledge or information about each device. See. Col. 11, lines 54-64. Such a system is useful, as described at col. 11, lines 54-56, for aircraft, trains, buses, etc. where a user may desire to connect a portable device to a power supply. Potega describes that the power requirements for the device are determined, and then power supplied to the device accordingly. Thus, if Potega were modified as suggested in the Office Action, a configuration would be provided for affecting power provided or interrupted to the plurality of power-control outlets would be included in this system. However, if Potega were operated using a configuration as claimed, this reference would no longer work for its intended purpose of providing power based on a particular device that is connected to a power supply. Furthermore, the Office Action cites reduced network traffic as providing motivation to modify Potega in the manner as described. However, each time a new device is added, a new configuration would be required, and thus the amount of network communication would actually increase. In fact, if anything, it is submitted that Potega would actually teach away from a combination as suggested in the Office Action, which is further evidence of non-obviousness.

Therefore, it is submitted that Potega, Nierlich, and Karanam, alone or in any reasonable combination, do not render claim 1 obvious. Accordingly, claim 1 is allowable because the cited references do not render the claim obvious. Accordingly, the applicants respectfully submit that the 35 U.S.C. 103(a) rejection should be withdrawn from independent claim 1 and such action is respectfully requested.

Claim 13

Independent claim 13 is directed to a remote power manager system in communication with a distal power manager application through a data communications network. Claim 13 comprises:

> A. a remote power manager having power input connectable to a power network that provides power to be distributed to associated electronic devices, a plurality of power-control power output ports connectable to the power input and the associated electronic devices, a power controller in power controlling communication with the plurality of power-control power output ports, a data communications network port system in communication with the power controller and being connectable to the data communications network, and a power manager memory providing storage for a power-control power output port user configuration, the power-control power output port user configuration comprising user configuration data for supplying or interrupting power to the plurality of power-control power output ports and
>
> B. a power-control power output port user configuration transfer application providing for selectably importing a power-control power output port user configuration from the distal power manager application through the data communications port system to the power manager memory, or exporting the power-control power output port user configuration from the power manager memory through the data communications network port system to the distal power manager application over the data communications network through a plurality of packets that are assembled form the power-control power output port user configuration.

It is respectfully submitted that the cited references do not render claim 13 obvious. Potega, as discussed above, is directed to a power supply that may detect power requirements and configure itself to provide correct power to the device. A number of power supplies may be used, with a master control unit that controls the delivery and supply of power for each of the power supplies. For example, as described at col. 30, line 63, through col. 31, line 8, a remote Master Control Unit (MCU) sends commands to controllable power supplies. However, Potega is

devoid of any disclosure of a remote power manager as claimed, having a plurality of power-control power output ports connectable to the power input and the associated electronic devices and a power manager memory providing storage for a power-control power output port user configuration, the power-control power output port user configuration comprising user configuration data for supplying or interrupting power to each of the plurality of power-control power output ports, as claimed. In fact, Potega does not describe anything relating to a power-control outlet user configuration.

Nierlich and Karanam are discussed above. As discussed above, Nierlich does not teach or suggest a power-control outlet user configuration, nor a power-control outlet user configuration accessible by a remote user system for affecting power provided or interrupted to a plurality of power-control outlets, a memory, or at least one power controller board, as claimed. Nierlich describes a system and method for monitoring and controlling energy distribution in which control signals may be transmitted to end-users or end-user control systems in the event of a curtailment event.

Karanam, as discussed above, is directed to a system that includes a dynamic data exchange (DDE) server used in a power management control system. As discussed above, Karanam does not teach or suggest anything related to a power-control outlet user configuration, nor a power-control outlet user configuration accessible by the remote user system for affecting power provided or interrupted to the plurality of power-control outlets, wherein the power-control outlet user configuration comprises user configuration data for each of the plurality of power-control outlets disposed in the power-distribution apparatus. Furthermore, Karanam also has no disclosure related to a memory, or power controller board as claimed in claim 1.

The Office Action states that Potega does not provide a power-control outlet configuration, and asserts that rather than sending commands one at a time as taught by Potega, one of ordinary skill in the art would have been motivated to use

Nierlich's configuration to save on the amount of communications on the network. Applicants disagree.

As noted, the Office Action asserts that to the extent Potega transfers information from a MCU to a controllable power supply, transferring the information in a configuration would be more efficient. However, Potega is directed to applications in which various different powered devices may be connected to a power supply, and the power supply reconfigures its output voltage to the powered device's requirements without user intervention and without any pre-programmed prior knowledge or information about each device. See. Col. 11, lines 54-64. Such a system is useful, as described at col. 11, lines 54-56, for aircraft, trains, buses, etc. where a user may desire to connect a portable device to a power supply. Potega describes that the power requirements for the device are determined, and then power supplied to the device accordingly. Thus, if Potega were modified as suggested in the Office Action, a configuration would be provided for affecting power provided or interrupted to the plurality of power-control outlets would be included in this system. However, if Potega were operated using a configuration as claimed, this reference would no longer work for its intended purpose of providing power based on a particular device that is connected to a power supply. Furthermore, the Office Action cites reduced network traffic as providing motivation to modify Potega in the manner as described. However, each time a new device is added, a new configuration would be required, and thus the amount of network communication would actually increase. In fact, if anything, it is submitted that Potega would actually teach away from a combination as suggested in the Office Action, which is further evidence of non-obviousness.

Therefore, it is submitted that Potega, Nierlich, and Karanam, alone or in any reasonable combination, do not render claim 13 obvious. Accordingly, claim 1 is allowable because the cited references do not render the claim obvious. Accordingly, the applicants respectfully submit that the 35 U.S.C. $ 103(a)

rejection should be withdrawn from independent claim 13 and such action is respectfully requested.

Claim 14 is a dependent claim that depends from independent claim 13. Consequently, claim 14 is at least allowable for the reasons noted with respect claim 13 from which it depends. However, this dependent claim may be allowable for additional reasons, and the applicant reserves the right to assert any such reason in the future.

Authorization to Charge Fees

No claim related fees are believed to be due with this response. In the event any such fees are due, please debit Deposit Account 08-2623.

In the event that a petition for extension of time under 37 CFR §1.136(a) is required to have this reply considered and such a petition does not otherwise accompany this reply, please consider this a petition for an extension of time for the required number of months and authorization to debit Deposit Account 08-2623 for the required fee.

Conclusion

The application now appearing to be in form for allowance, reconsideration and allowance thereof is respectfully requested. If a telephone conversation will further the prosecution and/or expedite allowance, the examiner is invited to contact the undersigned attorney.

Respectfully submitted,

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